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Jessica Sandler <jessicas@peta.org> on 07/05/2002 04:57:40 PM

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To: NCIC OPPT/DC/USEPA/US@EPA, ChemRTK HPV/DC/USEPA/US@EPA, Rtk  
Chem/DC/USEPA/US@EPA, Karen Boswell/DC/USEPA/US@EPA, Steve\_b.\_kemp@oxy.com

cc:

Subject: Public comments

Attached please find our public comments on Occidental's data summary for p-chlorotoluene.

Jessica Sandler, MHS  
Federal Agency Liaison  
People for the Ethical Treatment of Animals  
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- HPV test plan comments -- p-chlorotoluene.pdf

July 5, 2002

Christine Todd Whitman, Administrator  
U.S. Environmental Protection Agency  
Ariel Rios Building  
Room 3000, #1101-A  
1200 Pennsylvania Ave., N.W.  
Washington, DC 20460

Subject: Comments on Occidental Chemical Corporation's HPV summary for  
p-chlorotoluene

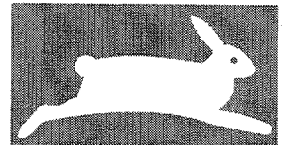
Dear Administrator Whitman:

The following comments on the Occidental Chemical Corporation's summary for p-chlorotoluene are submitted on behalf of People for the Ethical Treatment of Animals, the Physicians Committee for Responsible Medicine, the Humane Society of the United States, the Doris Day Animal League, and Earth Island Institute. These health, animal protection, and environmental organizations have a combined membership of more than ten million Americans.

The submission by Occidental Chemical is unusual, in that it is not a test plan *per se*, but rather a summary of data that was developed prior to the company ceasing production and importation of p-chlorotoluene. Since the company no longer deals in the chemical, no additional testing is planned by Occidental. Given the existing data and our knowledge of the chemistry and toxicity of these substances, it is wholly appropriate that no further testing be conducted on these substances. We applaud Occidental Chemical in submitting this data summary, as it brings into the public realm these data, which should result in reduced testing needs in the future. We encourage Occidental to resubmit this document clearly identifying that it is not a test plan, but rather simply a data summary, as it did in its cover letter.

We recommend that p-chlorotoluene be grouped with the existing chlorobenzene category sponsored by the Chlorobenzene Producers Association. The only difference between monochlorobenzene and p-chlorotoluene is the presence of a single methyl group. The physical properties of these compounds and the existing toxicological profiles are quite similar, making them an obvious grouping. Combined with the extensive data available for both monochlorobenzene and p-chlorotoluene, additional testing should be unnecessary.

Further, additional testing would be uncalled for based simply on the existing data for these chemicals. For example, the robust summaries provide examples of 13 separate acute mammalian studies on at least one of the members of this category, with studies being conducted on many different species, and using inhalation, oral, and dermal pathways. Existing data from chlorobenzenes, combined with the fact that repeat dose and developmental tests have already been conducted on the p-chlorotoluenes, means that many animals have already died to study these



**PETA**

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THE RIGHTS OF ALL ANIMALS

substances for repeat dose, reproductive and developmental endpoints, and further testing would provide no new insight into the relatively low toxicity of these substances. Given the existing knowledge about these substances and an appropriate grouping with the chlorobenzene group, we ask that the EPA take some proactive steps to encourage the incorporation of these chemicals into a larger category, and to specifically recognize that existing data are adequate, and that no further testing is needed on these chemicals.

Thank you for the opportunity to comment. I can be reached at (757) 622-7382, ext. 1304, or by e-mail at [jessicas@peta.org](mailto:jessicas@peta.org). Correspondence should be sent to my attention at the following address: 501 Front St., Norfolk, VA 23510, fax: (757) 628-0781.

Sincerely,

Jessica Sandler, MHS  
Federal Agency Liaison